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Frank S. Simone  
Government Affairs Director

MAY 7 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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May 7, 1999

Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 Twelfth Street, S. W. - Room TWB-204  
Washington, D. C. 20554

Re: Ex parte, CC Docket No. 96-98, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996

Dear Ms. Roman Salas:

On Thursday, May 6, 1999, Rian Wren, Russell Morgan, Roy Hoffinger, Al Lewis and the undersigned, all of AT&T, met with Larry Strickling, Chief of the Commission's Common Carrier Bureau and Jake Jennings, Audrey Wright and Jordan Goldstein of the Common Carrier Bureau's Policy and Program Planning Division. The purpose of the meeting was to update the Bureau on the status of the Operational Support System ("OSS") testing currently underway in Texas and, in general, the timing of AT&T's plans for local service market entry in Texas in 1999.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

FS Simone (gs)

ATTACHMENT

cc: L. Strickling  
J. Jennings  
A. Wright  
J. Goldstein

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# Texas OSS Testing

May 6, 1999



# OSS Test Deficiencies That Must Be Corrected

- Current Test Design will not Support Stated Test Objectives
  - Volumes
  - Capacity test only includes preordering and ordering and not provisioning or billing
- No Review of Documentation/Change Control Process

# OSS Test Deficiencies That Must Be Corrected

- Performance Measures Validation
  - Not clearly outlined
  - Should occur prior to testing
- No Blindness Whatsoever
  - knows scenarios
  - how many orders are coming
  - when test orders are coming

# OSS Test Deficiencies That Must Be Corrected

- Process Issues
  - Schedule is the driving force
  - No record or minutes of test or systems process
  - Test plan proprietary
  - Test has started without finalized Test Plan
  - No formalized exception process to clear OSS failures
  - Bellcore disclaimer instead of validation





Rian J. Wren  
President - Southwest Region

May 6, 1999

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Chairman Patrick H. Wood  
Texas Public Utility Commission  
1701 N. Congress Ave.  
Austin, TX 78711

Commissioner Judy Walsh  
Texas Public Utility Commission  
1701 N. Congress Ave.  
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Commissioner Brett A. Perlman  
Texas Public Utility Commission  
1701 N. Congress Ave.  
Austin, TX 78711

Subject: AT&T Market Entry

Dear Commissioners:

Based on the commitments we have made regarding AT&T's UNE market entry plans and recent discussions we have had, I felt it important to keep you informed of issues that may impact our market entry.

SWBT implemented its quarterly EDI release last weekend (5/01 release) after providing the CLEC community only 5 days to test the release. On Friday, April 30, 1999, we requested that the release be delayed due to the fact that we were experiencing a number of problems as a result of incorrect coding by SWBT on its side of the EDI interface. In fact, SWBT's coding errors prevented us from being able to execute 16 of the 17 test scenarios scheduled for the 5-day testing timeframe. The inability to complete testing left us in a position where we were unable to identify additional problems prior to SWBT's release implementation. Last Friday, we made the request to delay the release through our account team, up to and including officer level at SWBT, and escalated our request to the Commission through Docket 19000.

Because AT&T is not in a commercial environment at this time, SWBT went forward with the implementation of its release despite AT&T's requests and despite the problems we identified. If AT&T were in a commercial environment today, AT&T's ability to serve its customers would now be seriously disrupted as a result of the deficiencies in SWBT's release. Through the service readiness testing that we currently have underway, we are continuing to experience the same problems we raised to SWBT last week, which are impacting our ability to process change and supplemental orders, and we have identified additional significant problems, e.g., we are now receiving manual return transactions (FOCs and rejects) via fax as opposed to electronic transactions via the EDI interface. Once again, the fact that SWBT will not have a robust test environment in place until 1/2000 puts CLECs in a position where testing cannot effectively be completed prior to introducing changes into the marketplace; hence placing customer service at risk.

The root cause of the problems in the case of the 5/01 release, as was the key reason that the implementation of SWBT's December 19, 1998, release went so badly, is the lack of a proper change control process. Based on our experiences with the May 1 release as well as the December 19, 1998, release, we have requested that SWBT address the change control process problems prior to the implementation of next release, i.e., June 26, 1999. The specific change control requirements that we have been raising since its inception include:

- the allowance of sufficient testing timeframes (e.g., 30 to 60 days prior to implementation depending on the size of the release (30 days for the 6/26/99 release));
- documentation of testing entrance and exit criteria between parties; and
- the adoption of a formal go/no go decision process amongst all participants to govern actual implementation.

If the change control process is not fixed, we will find ourselves in a position where our end-user customers are negatively impacted as a result of SWBT's failure to implement its systems releases correctly and in accordance with the requirements that they themselves provide to the industry.

To the extent our requests are not addressed by SWBT, we will be requesting Commission resolution.

If you have any questions or wish to discuss this, please feel free to contact me at (972) 778-2595.

Sincerely,



Rian J. Wren